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December 27, 2017

**Via ECF**

The Honorable Denise L. Cote  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 1610  
New York, NY 10007

Re: *Rosenfeld v. Time Inc.*, Consol. C.A. No. 17-cv-9886-DLC  
*Pill v. Time Inc., et al.*, C.A. No. 17-cv-09971-DLC

Dear Judge Cote:

We represent plaintiff David Pill in the above-referenced consolidated action. We write in response to Your Honor's Order dated December 26, 2017, which, among other things, requested a letter be filed describing Mr. Pill, similar to the letter Your Honor ordered in the Scheduling Order, dated December 22, 2017, in the *Rosenfeld* action.

Mr. Pill is 53 years old and was born and raised in Brooklyn. His current address is 3552 Bedford Avenue, Brooklyn NY 11210. For approximately the last five years, Mr. Pill has been primarily an investor while winding down his diamond business, which he was in for approximately 10 years before that. Prior to being in the diamond business, Mr. Pill worked in the information technology industry. Mr. Pill has been a client of Wolf Popper for approximately six years and was introduced to the firm by his father, who had been a client of the firm for many years. There is no familial or other relationship between Mr. Pill and anyone at Wolf Popper.

As reflected in the certification form that was filed with the complaint in the *Pill* action, Mr. Pill acquired 8 shares of Time Inc. on June 9, 2014. He acquired these shares when Time Inc. was spun off from Time Warner and continues to hold them.

On November 27, 2017, Mr. Pill contacted me after reading the press release announcing the transaction that is the subject of this action. After the Schedule 14D-9 was issued, I had further discussions with Mr. Pill. He reviewed a draft of the *Pill* complaint and authorized its filing.

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Like plaintiff's counsel in the *Rosenfeld* action, I believe that nothing in the PSLRA precludes the filing of a preliminary injunction motion prior to the completion of the PSLRA lead-plaintiff process. If necessary, Mr. Pill and Wolf Popper are prepared to litigate the action on an individual basis.

As requested by Your Honor, the following is a list of cases, other than this one, started by my firm in which Mr. Pill served or serves as a named plaintiff:

*In re Icagen, Inc. Shareholder Litig.*, Consol. C.A. No. 6692-CS (Del. Ch. 2011)

*In re Zale Corp. Stockholders Litig.*, Consol. C.A. No. 9388-VCP (Del. Ch. 2014)

*Pill v. Penford Corp.*, Civ. A. No. 14-cv-02867 (D. Col. 2014)

*In re Penford Corp. S'holders Litig.*, Civ. A. No. 14-2-29641 (Wash. Sup. Ct. 2014)

*Pill v. Span-America Med. Sys., Inc.*, Civ. A. No. 17-cv-01375-MGL (D.S.C. 2017)

*Pill v. Angie's List, Inc.*, Case No. 17-cv-02461-JMS-MJD (S.D. Ind. 2017)

*Pill v. Tribune Media Co.*, Civ. A. No. 17-cv-00961-UNA (D. Del. 2017)

*Pill v. Westar Energy, Inc.*, Civ. A. No. 17-cv-04086 (D. Kan. 2017)

*Pill v. Steel Partners Holdings L.P.*, Index No. 657304/2017 (N.Y. Sup. Ct., N.Y. County 2017)

Respectfully submitted,



Carl L. Stine

cc: all counsel of record (via ECF)